

RCRA PERMIT
FOR THE
IDAHO NATIONAL LABORATORY

Volume 14
INTEC Liquid Waste Management System

Attachment 5, Section H
Personnel Training

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ACRONYMS

1	CFR	Code of Federal Regulations
2	EAM	Emergency Action Manager
3	ED	Emergency Director
4	ERO	Emergency Response Organization
5	GERT	General Employee Radiological Training
6	IDAPA	Idaho Administrative Procedures Act
7	INL	Idaho National Laboratory
8	INTEC	Idaho Nuclear Technology and Engineering Center
9	IWTS	Integrated Waste Tracking System
10	IWTU	Integrated Waste Treatment Unit
11	OJT	on-the-job training
12	OSHA	Occupational Safety and Health Administration
13	RCRA	Resource Conservation and Recovery Act
14	SAT	systematic approach to training
15	TSD	treatment, storage and disposal
16	WGS	Waste Generator Services

H. PERSONNEL TRAINING

This section outlines and describes the training program for personnel involved in the management of hazardous and mixed waste at treatment, storage, and disposal (TSD) units at the Idaho Nuclear Technology and Engineering Center (INTEC), including units addressed in this permit.

A training program has been implemented to ensure that personnel involved in the management of hazardous and mixed waste at INTEC TSD units receive training consistent with the requirements of the Idaho Administrative Procedures Act (IDAPA) 58.01.05.008 and 58.01.05.012 [Title 40 Code of Federal Regulations (CFR) Part 264.16 and 270.14]. The training program is designed to ensure that personnel are trained to hazardous waste management procedures including, but not limited to, inspections, normal operations, emergency procedures, equipment, systems, and contingency plan implementation. Duties performed at the TSD units will be performed in a safe, disciplined, and professional manner.

H-1. Outline of Training Program [IDAPA 58.01.05.008; 40 CFR § 264.16(a)(1)]

Training programs are developed using a systematic approach to training (SAT). The SAT process involves:

- Analyzing tasks to determine the training requirements
- Designing a plan to satisfy the training requirements
- Developing plans and all supporting training materials
- Implementing the training plans
- Evaluating the effectiveness of the training and making recommendations for changes.

The SAT process is used to determine the training requirement for each task listed in Table H-1. The training program for TSD unit personnel involves a combination of formal [classroom, group instruction, on-the-job training (OJT), etc.] and informal training sessions (one-on-one instruction, required reading, etc.). The training requirements for each position are identified in Table H-1. Lesson plans and OJT guides are developed to support tasks identified in Table H-1.

1 Programs prepared by the TSD training organization provide the requirements to be completed by
2 the individual during training. As the program is satisfactorily completed, it is verified and documented
3 in their training records.

4 The training program is upgraded as needed in response to changes in job descriptions, job
5 reassignment, process or procedural changes, technological changes, or implementation of new regulatory
6 requirements that affect TSD unit operations. Revisions to the training program are approved by the
7 training manager and the TSD unit manager (Training Director) for the specific TSD unit and the job
8 analysis data is updated to reflect the changes in the training requirements.

9 TSD unit management works with subject matter experts to identify personnel training
10 requirements. The TSD unit training organization: (1) schedules and/or provides the training, (2) revises
11 and updates training material as needed, and (3) maintains training documentation. The TSD unit training
12 organization maintains individual training records for TSD unit employees.

H-1a. Job Tasks [IDAPA 58.01.05.008; 40 CFR §§ 264.16(d)(1) and 264.16(d)(2)]

13 The job tasks for personnel involved with hazardous waste management at INTEC TSD units are
14 included in Table H-1 “Minimum Training Matrix for TSD unit Personnel.” Personnel are trained to
15 those sections of the permit, which are pertinent to their specific job assignments.

16 Security Guards – The Security personnel are not stationed at the permitted units nor are they
17 involved in the management or handling of the waste. Security personnel receive training from the
18 security organization relative to their positions and the facilities they serve. Therefore, training of
19 security personnel is not discussed further in this section.

20 Incident Commander – is the INL Fire Department Chief. The INL Firefighters serve the INL
21 Site in fighting fires and containing major spills, including spills of waste from waste management units.
22 The INL Fire Department conducts a self-contained training program for their personnel, which includes
23 procedures for handling fires and spill emergencies involving hazardous materials and hazardous mixed
24 waste at the INL Site. Therefore, training of fire fighters is not discussed further in this section.

25 Emergency Director (ED) – is trained on the INL (Site-wide) Emergency Plan/RCRA
26 Contingency Plan or Industrial Safety and Hygiene Program as part of his/her duties. The ED will be

informed by the EAM or facility personnel at INTEC. Therefore, training of the ED is not discussed further in this section.

H-1b. Training Content, Frequency, and Techniques [IDAPA 58.01.05.008; 40 CFR § 264.16]

The TSD unit training program consists of a combination of classroom instruction and OJT. Additionally, TSD unit employees receive new employee orientation and training. [All employees working at or assigned as part-time/frequent visitor to Site facilities are required to complete annual facility access training and general employee radiological training (GERT) unless they are currently trained as radiation workers.]

The initial training includes a general orientation of INL Site and TSD unit procedures including evacuation and alert procedures, training requirements, and emergency equipment locations. The initial training provides TSD unit personnel with training commensurate with their job assignments in the following areas:

- General description of the INTEC
- Job-related procedures, policies, and instructions
- Radiological health and safety program
- Fire protection program
- Hazards associated with the TSD unit.

Resource Conservation and Recovery Act (RCRA) training is conducted annually for INTEC TSD unit employees to address changes that have occurred which include such topics as permit status, permit requirements, contingency and inspection plan implementation, and hazardous waste management procedures for the TSD unit(s) to which they are assigned.

The following major knowledge areas are included and evaluated based on job position and formal criteria identified in the job analysis:

- RCRA requirements as they relate to INTEC unit operations
- Hazardous materials

- INTEC TSD unit systems and components (including waste treatment processes and operations)
- Normal operating procedures and shutdown procedures
- Emergency or off-normal operating procedures
- Inspections and equipment maintenance
- Occupational Safety and Health Administration (OSHA) and related health and safety requirements, as required
- INTEC TSD unit and operational/administrative procedures.

TSD unit work and maintenance is performed by appropriate personnel whose qualifications have been verified before beginning work.

Employees may be given written and/or oral examinations, operational evaluations, and reviews to ensure that they are adequately trained relative to their job tasks. Results of examinations, written or oral evaluations, and reviews are documented. All completed qualification standards, checklists, examinations, written evaluations, and documented oral evaluations are maintained in each individual's training record.

Table H-1 shows the task training requirements for TSD unit personnel involved in hazardous/mixed waste operations at INTEC TSD units addressed in this permit. TSD unit personnel may receive additional training beyond that shown in Table H-1. This training is documented and included in employee training records.

Occasionally, TSD unit personnel attend training classes conducted external to the INL or conducted at the INL Site by non-INL subcontract personnel. In order to verify an employee's attendance at these training courses, a copy of the class certification or other documentation is maintained in the individual's training record.

H-1c. Training Director [IDAPA 58.01.05.008; 40 CFR § 264.16(a)(2)]

For all TSD units, the facility manager (training director) functions in conjunction with his/her designee(s) to ensure that all segments and responsibilities associated with the training program are accomplished. The training director provides overall leadership and management direction to the TSD unit training organization. The director's duties include the following:

- Provide direction to the TSD unit training organization
- Ensure that performance of training personnel is evaluated
- Approve TSD unit training program
- Ensure that all program objectives and requirements are satisfied and that the training program meets the requirements of IDAPA 58.01.05.008 (40 CFR 264.16) and 29 CFR 1910.120.

The training director or his/her designee(s) is responsible for ensuring that TSD unit personnel are trained in waste management and contingency plan implementation, including emergency procedures, and for ensuring that TSD unit personnel receive training appropriate to their tasks. The training director also reviews documentation, including feedback from audits, operating logs, emergency exercise critiques, and employee recommendations, for possible inclusion into the TSD unit training programs.

H-1d. Relevance of Training to Job Tasks [IDAPA 58.01.05.008; 40 CFR § 264.16(a)(2)]

Individual training program profiles are prepared for each TSD unit position that requires a formal training program.

At a minimum, each individual training program profile identifies the following:

- Job description
- Qualifications
- Training requirements.

Profiles typically identify qualification requirements. Occasionally, a position may require specialized training. Special-case training is documented in individual training records. Profiles include requirements for hazardous/mixed waste management or handling and emergency response training.

Supervisors have the responsibility for evaluating training requirements for TSD employees. These supervisors receive additional training in how to conduct and evaluate OJT.

Individuals who demonstrate an equivalency for specific requirements or prerequisites identified in the training profile may be exempted from requirements in accordance with established procedures. Exemptions/equivalencies must be approved by the training director. Each exemption/equivalency is granted in writing and documented in the individual's training record.

Table H-1. Training Matrix for TSD Unit Personnel

Task	Audience					Applicable Sections of RCRA Permit ²
		Initial Employee Training	Rad Training ¹	24 hour OSHA ¹	Annual RCRA Training	
INTEC operations personnel that perform TSDF operations, or supervise those operations, and are exposed to the hazards of the TSDF. These employees have duties that may bring them into contact with hazardous/mixed waste. These employees are required to obtain 24-hr HAZWOPER TSDF Qualification.	INTEC RCRA Worker	X	X	X	X	C, D, F, G
Personnel who enter TSDF areas unescorted and provide support functions that may require them to interface with systems, structures, or components referenced within the facility RCRA Permit, or that may bring them into contact with hazards of the facility to include the potential for exposure to hazardous/mixed waste at the TSDF. These employees are required to obtain 24-hr HAZWOPER TSDF Qualification. Examples of work activities include radiological surveys, inspections, waste characterization, performing waste shipments or waste movement, repairing or replacing facility emergency/monitoring equipment, life safety systems support, equipment calibrations, and surveillance. Examples of workers that may be included are Quality Inspectors, Quality Engineers, System Engineers (assigned to TSDFs), Life Safety System Engineers, Environmental Engineers, Industrial Hygienists, Safety Engineers, Packaging and Transportation representatives, Waste Technical Specialists, Crafts (instrument technician, pipefitter, mechanic, welder, painter, etc.) and Radiological Control Technicians.	INTEC RCRA Technical Support Worker - HAZWOPER	X	X	X	X	F, G

Table H-1. (continued)

Task	Audience	Initial Employee Training	Rad Training ¹	24 hour OSHA ¹	Annual RCRA Training	Applicable Sections of RCRA Permit ²
Personnel who enter TSDf areas unescorted and provide support functions that may require the individual to interface with systems, structures, or components referenced with the facility RCRA Permit. Personnel in this category generally do not have the potential for exposure to the hazardous or mixed waste (for instance, these employees are not required to wear PPE and are not required to complete 24-hr HAZWOPER training). Examples of workers that may be included are System Engineers (not assigned to TSDf's), and other personnel who perform the activities listed above.	INTEC RCRA Technical Support Worker	X	X		X	F, G
Personnel who enter TSDf areas unescorted and provide only incidental support to facility operations. These individuals are not directly exposed to the hazards of the TSDf but must be cognizant of the RCRA-related requirements for access. Additionally, these personnel are not required to complete 24-hour HAZWOPER training. Examples of positions within this level include: Maintenance Planners, Radiological Engineers, RCT Supervision, personnel assigned as Senior Supervisory Watch, Training Specialists, Waste Disposition Specialists, D&D Workers, and administrative support personnel.	INTEC RCRA General Employee	X			X	F, G
INTEC EAM conducts operations-related response; Coordinates protective actions or protective action recommendations; authorizes response resources; satisfies federal, state, and local requirements and declares the INTEC Emergency Control Center operational.	INTEC Emergency Action Managers	X	X	X	X	G
1. Personnel who are not exposed to the hazards of the regulated units may not require this training 2. Personnel receive training related to the permit section as appropriate to their job function.						
Section C- Waste Characterization Section D – Process Information			Section F – Procedures to Prevent Hazards Section G – Preparedness, Prevention, and Contingency Plan			

H-1e. Training for Emergency Response [IDAPA 58.01.05.008; 40 CFR 264.16(a)(3)]

Emergency response training is provided to all personnel assigned to or associated with TSD units, including specialized training for employees with specific emergency action responsibilities, such as the Emergency Action Manager (EAM) and Emergency Response Organization (ERO) personnel. The following presents an overview of the emergency response training.

General emergency response training of TSD unit ERO personnel includes the following:

- Spill Control Plan
- Evacuation/accountability
- Emergency drill/exercise
- RCRA
- Emergency Plan Implementing Procedures
- Emergency preparedness
- Incident command system
- Inspection and repair of facility emergency monitoring equipment.

ERO members respond to emergency events. ERO members receive initial training and annual requalification training, in addition to training provided to general employees. Training of ERO members is outlined by position in company procedures. All INTEC employees receive general employee emergency response action training.

H-2. Implementation of Training Program [IDAPA 58.01.05.008; 40 CFR §§ 264.16(b), 264.16(d)(4), 264.16(e)]

After completion of new employee orientation, designated employees enter a training program specific to their job assignment. Persons holding qualifications are retrained and reevaluated as mandated by procedures. Job assignments, which are required for the completion of a training program, have time and performance limitations that must be satisfied to meet program qualification criteria.

RCRA training is completed within the first six months of the individual's employment or assignment, and at least annually thereafter, for positions involving TSD unit operations. Throughout the training program and until completion, employees do not perform their job duties unsupervised.

H-3. Training Records [IDAPA 58.01.05.008; 40 CFR §§ 264.16(d)(4) and (e)]

Individual training records are maintained for personnel assigned to TSD units. Training records include documentation of completed training, such as class rosters, signed checklists, completed exams, database printouts from additional training classes attended, and other documents verifying training. The original training records are maintained by the presenting organizations, which enter course completion information into a database. A hard copy of this information is also entered into the individual's training record.

The training records include the names of employees filling each TSD unit position. Job tasks and associated training requirements for each TSD unit are found in Table H-1.

Individual training records include, as a minimum, the following:

- Initial training and retraining programs
- Attendance records of training received
- Results of exams, walk through, and job performance assessments related to certification.

Training records for current employees at each TSD unit are maintained until closure of the unit or the employee terminates or transfers to a non-TSD unit position. The training records of terminating employees are maintained at the TSD unit for a minimum of three years from the date the employee last worked at a TSD unit. The training records for TSD unit employees who transfer to a non-TSD unit position within the company are forwarded to the employee's new organization where they continue to be available for at least three years.